

February 20, 2006

Mr. Jim Tischler Regional Water Quality Control Board, Northcoast Region 5550 Skylane Blvd., Suite A Santa Rosa, CA 95403

Re: SOMA Environmental's Request for Reducing the Number of Groundwater Monitoring Events to an Annual Basis at A&M Mini-Mart, 440 Hearn Avenue, Santa Rosa, California

Dear Mr. Tischler:

This is our formal request to reduce the number of groundwater monitoring events at the above referenced site from a semi-annual basis to an annual basis. Currently, there are 32 groundwater monitoring wells at the site. These wells are completed in six different water-bearing zones: A, B1, B2, C, D, and E.

To further remediate the more impacted shallow zone regions (A, B1, and B2), SOMA installed a granular activated carbon (GAC) system and initiated groundwater remedial activity on January 26, 2005. To further remediate the impacted unsaturated zone, in the vicinity of the fuel islands and former UST cavity, SOMA installed three soil vapor extraction wells and began vapor extraction using an I.C. Engine. The SVE system began operating on June 22, 2005.

Based on the following reasons, groundwater monitoring should be conducted on an annual basis:

- The results of the groundwater monitoring events have indicated that the
 deeper water-bearing zones, such as the C, D, E zones, have not been
 significantly impacted with petroleum hydrocarbons. In addition, the results
 of the previous monitoring events have indicated that the concentration of
 chemicals in the deep wells do not drastically change with time.
- The continual operation of the remedial systems should greatly reduce the
 off-site migration of chemicals, as well as the vertical migration between
 the shallow and deeper zones. Therefore, it appears that the migration of
 the chemicals in the shallow and intermediate zones, due to the operation
 of the groundwater extraction system, has been greatly reduced.
- For cost saving purposes, we recommend conducting the groundwater monitoring events on an annual basis. In addition, for further cost saving

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purposes, the future groundwater monitoring reports will only include the historical chemical data and a limited and condensed text describing the results of the monitoring events. As such, no colored figures for the chemical plumes will be presented.

Thank you for taking the time to review this matter. Meanwhile, please do not hesitate to call Mr. Tony Perini, Senior Project Engineer, or myself at (925) 734-6400, if you have any questions or comments.

Sincerely,

Mansour Sepehr, Ph.D., PE Principal Hydrogeologist No. CO 12928 AND COLUMN COLUMN

cc: Mr. Michael Gholami, 440 Hearn Avenue Santa Rosa, California